2024 ANNUAL REPORT

SBM OFFSHORE

TRUE.
BLUE.
TRANSITION.

3.9 REPORTING BOUNDARIES

This section describes the boundaries of SBM Offshore's sustainability statement which, aligned with the financial statements scope, discloses information from January 1 to December 31, 2024 on a consolidated basis for SBM Offshore N.V. and subsidiaries.

3.9.1 GENERAL INFORMATION

CHANGES IN PREPARATION OR PRESENTATION OF SUSTAINABILITY INFORMATION

Following a continuous improvement approach, each annual report SBM Offshore aims to provide clearer, more granular and accurate information. As an illustration, in 2023 the GHG emissions were reported per region, while from 2024 SBM Offshore is reporting emissions per country as ESRS specified (see more details in section 3.4.2).

REPORTING ERRORS IN PRIOR PERIODS

SBM Offshore is not including in this report any restatement to correct material errors in prior periods.

No material ESRS disclosure requirement was omitted on the grounds of it being classified or sensitive information.

EXTERNAL VALIDATION

SBM Offshore seeks to use metrics and set targets based on recognized standards, sectorial guidelines and benchmarks, science-based approach (when available), certifications, despite this the measurement of the metric is not specifically validated by an external body.

USE OF THIRD-PARTY INFORMATION

In calculating the relevant KPIs, SBM Offshore incorporates supplier data to report Scope 3 emissions for Category 1 (Purchased Goods and Services) and Category 6 (Business Travel), as well as working hours data. Additionally, SBM Offshore also utilizes widely recognized emission factors and industry benchmark data sets to ensure accuracy and consistency in greenhouse gas (GHG) calculations.

ESG MATERIAL TOPICS OVERVIEW

ESG Material Topics definitions

Environmental Topics	
Emissions	Manage scope 1, 2 and 3 emissions (GHG and Non-GHG emissions, such as methane, NOx, SOx emissions, etc.) to reduce them as much as possible.
Decommissioning	Decommissioning is a structured process of planning, preparation and execution, leading to the eventual removal from service or reuse of an asset, giving due consideration to the potential impact on the environment and communities – including the following activities: safe removal of hazards from an asset, recycling, restoration and remediation.
Social Topics	
Our People	Relates to all aspects of working life, from the quality and safety of the physical environment, to how workers feel about their work, their working environment, the climate at work and work organization. It covers the full life cycle – from hiring to training, development, remuneration and transitions. Providing a healthy work environment for employees, with training and education and regular performance feedback, and enabling them to grow through SBM Offshore with meaningful employment.
Health, safety and security	Occupational health and safety management system set of interrelated or interacting elements to establish an occupational health and safety policy and objectives. This includes Process Safety Management. The aim is to provide a safe, secure and reliable work environment for all employees, promoting good health, adequately protecting them from infectious diseases and providing a secure work environment.
Human rights	Human rights: rights inherent to all human beings, which include, at a minimum, the rights set out in the United Nations (UN) International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work. SBM Offshore strives to provide a work environment for employees in which basic human rights for all employees are respected and maintained. Ensure social dialogue with regards to labor conditions and impacts on communities.
Governance Topics	
Ethics and compliance	Being a trustworthy organization by complying with rules, regulations and SBM Offshore's code of conduct, including anti-corruption policies, procedures and mechanisms. Ethics provide the framework for making ethical decisions and drive responsible behavior. Compliance ensures decisions and actions are aligned with the Code of Conduct and legal/regulatory requirements.

Key indicators per ESG Material Topics

Material Topic	KPI	Definition
Emissions	MMSCF/D Average Flaring	The volumes of operational excellence gas flaring in scope 3 – downstream leased assets – Standard Cubic Feet (per day).
	Scope 1, 2 and 3 GHG emissions	Greenhouse gas emissions for the various scopes in tonnes of CO_2 equivalents
	GHG emissions intensity	GHG in tonnes per '000 tonnes of hydrocarbon production (scope 3 – downstream leased assets).
	GJenergy use	Energy consumption in GigaJoules (GJ).
	Other significant air emissions *(non-GHG emissions)*	Non-greenhouse gas emissions, which are CO (Carbon Monoxide), NOx (Nitrogen Oxides), SO_2 (Sulfur Dioxide) and VOCs (Volatile Organic Compounds), in tonnes.
	Oil-in-water discharge to % below IOGP average	Oil in Produced Water per hydrocarbon production in tonnes per million tonnes of hydrocarbon production. (This KPI applies to the units operated by SBM Offshore which are part of the CSR scope (i.e. *FPSO Serpentina* and *Thunder Hawk* are excluded).
Health, safety and security	Total Recordable Injury Frequency Rate (TRIFR)	Total Recordable Incidents of the Year x 200.000/ Total workhours of the year.
	Serious Injuries and Fatalities (SIF)	Serious Injuries and Fatalities.
	Lost Time Injuries Rate (LTIFR)	Total Lost Work Day Cases of the Year x 200.000 / Total workhours of the year.
	Tier 1 Process Safety Incident	All events having actual severity of 4 or 5 as defined in the Common Thresholds Matrix.
	Tier 2 Process Safety Incident	All events having an actual severity of 3 as defined in the Common Thresholds Matrix.
Ethics and compliance	# of reports received under SBM Offshore's Integrity Reporting Policy	The number of reports received under SBM Offshore's Integrity Reporting Policy.
	# of confirmed cases of corruption	The number of corruption cases confirmed.
Human rights	Compliance Training	Face-to-face training and e-Learning on Ethics and Compliance topics.
	% of suppliers who have been screened on human rights questionnaire	The percentage of suppliers with criticality D and above that have been screened with the human rights questionnaire. For high-risk suppliers assessment of risk is based on SBM Offshore human rights standard, using specific criteria, e.g. country risk, as well as expert judgement from within SBM Offshore.
	% of suppliers signing supply chain charter	The percentage of suppliers qualified between January 1 and December 31 that signed SBM Offshore's supply chain charter.
	# of yards that have completed desktop screening	The number of yards that have completed desktop screening (desktop screenings have to be assessed by SBM Offshore in 2024 related to prospect yards).
	# of worker welfare audits	The number of worker welfare audits completed in 2024 at yards with ongoing activities.
	% e-Learning completion	The percentage of targeted employees who have completed a human rights e-Learning course (based on all onshore staff and offshore leadership staff employed at year-end).
Our People	Gender pay gap	The average compa-ratio female/average compa-ratio male.
	# of new hires	Total number and rate of new employee hires during the reporting period.
	# of average training hours	The average of total training hours per employee in the current year.
	Employee turnover rate (%)	The number of employees who have left SBM Offshore in the current year (between January 1 and December 31) compared with the aggregate of the headcount on December 31 of the previous year and December 31 of the current year; divided by 2, with the result multiplied by 100.
	% of performance appraisals completion	The percentage of performance appraisals completed for permanent, temporary (only from Brazil and the Netherlands) and JV staff (apart from *FPSO Kikeh*) of all employees that joined SBM Offshore before October 1, 2023 and were still with SBM Offshore on December 31, 2023.

3.9.2 ENVIRONMENTAL REPORTING BOUNDARIES

The environmental information is reported under the same organization boundaries as the financial statement:

- Including fully consolidated entities
- Excluding unconsolidated joint ventures

SBM Offshore discloses GHG emissions using the operational control approach, as per the Greenhouse Gas Protocol. All generated GHG emissions related to SBM Offshore's business activities are reported and split between direct (scopes 1 and 2), and indirect (scope 3) emissions.

Other environmental KPIs, such as non-GHG emissions (other significant air emissions), number of oil spills above 1 bbl, and oil-in-water discharge to 54% below IOGP average emission to water, follow the same boundary and covering the FPSO's where SBM Offshore has an O&M agreement, which excludes Thunder Hawk Floating Production Unit.

EMISSIONS

Base year

SBM Offshore has set 2016 as the base year, being the first year with complete and verifiable data, for tracking the progress towards achieving 2030 targets and 2050 Net zero target.

Starting in FY25, following ESRS guidance, the base year shall be updated every five years.

For all reported emissions, the CO_2 equivalency is the quantity that describes, for a given mixture and amount of greenhouse gas, the amount of CO_2 that would have the same Global Warming Potential (GWP), when measured over a specified timescale (generally, 100 years).

GHG Emissions

Direct (scope 1) GHG emissions

For site emissions related to gas consumed and use of diesel for back-up power generators, SBM Offshore takes an operational control view and uses conversion factors from the Dutch Emission Authority, the website Co_2emissiefactoren.nl and the Greenhouse Gas Conversion Factors by the UK Government. The conversion factors are reviewed every year with the most recent data available.

Energy indirect (scope 2) GHG emissions

Scope 2 contains GHG emissions from energy purchased for offices (market-based and location-based). It is calculated using measured activity data (kWh energy consumed) and conversion factors from, among others, the Association of Issuing Bodies and Carbon Footprint Ltd.

For market-based scope 2 emissions, purchased green electricity is assumed to have an emissions factor of zero. The conversion factors are reviewed every year with the most recent data available.

The reporting scope includes all locations where the headcount is over 10. SBM Offshore reports onshore emissions data for the following locations: the Netherlands (Amsterdam, Schiedam), the United States (Houston), Malaysia (Kuala Lumpur), Switzerland (Marly), Monaco (Monaco), Brazil (Rio de Janeiro, Shorebases), China (Shanghai), France (Carros lab), Guyana (Georgetown), India (Bangalore), Portugal (Porto), Singapore, Angola (Luanda Shorebase) and Equatorial Guinea (Malabo Shorebase).

Other indirect (scope 3) GHG emissions

Scope 3 categories reflect an analysis performed using the GHG Protocol Technical Guidance for Calculating scope 3 Emissions. Since 2021, SBM Offshore applied a criteria aligned with its goals related to emissions and the criteria guided by the GHG Protocol (size of footprint, influence, risk, stakeholder interest, outsourcing, sector guidance and spending/revenue). The following categories are a result of this analysis and it is re-considered on an annual basis.

Category 1 – Purchased Goods and Services

This category consists of GHG emissions associated with the procurement of (capital) goods and services for FPSO projects (hereafter 'projects') that SBM Offshore is executing on behalf of clients. The FPSO projects represent the most significant part of SBM Offshore's purchased goods and services, compared to office-purchased goods and services. The following parts of an FPSO are considered in the calculations of the GHG emissions for this category:

- Hull (MPF) – the marine structure of an FPSO.
- Topsides – the processing facility of an FPSO. Other parts of the FPSO (mooring structure, integration etc.) are not accounted for in this initial GHG calculation due to the data limitations and the limited percentage they added in total weight.

SBM Offshore calculates the GHG emissions of its projects via the GHG protocol's average data method and has chosen a pragmatic approach to assess which components and materials used in projects contribute most to GHG emissions. The outcome of the analysis is initially focused on identifying GHG hotspots. Once they are identified, SBM Offshore can increase the accuracy of the GHG inventory via supplier engagement and, with that, abate emissions.

Category 6 – Business Travel

Business travel contains GHG emissions associated with the transportation of SBM Offshore employees for business-

related activities. This includes emissions from flights invoiced via SBM Offshore's standard travel system for all entities in operational control. The scope and data accuracy increased since 2023, due to both the addition of data from an additional travel agency and better data on multi-legged flights.

Business travel is determined based on flight data communicated by travel agencies, including mileage per invoice date and a calculated extrapolation of data for the last two weeks of the year. In a few cases where mileage data is missing, it is completed with mileage from a similar route. The GHG emissions relating to business flights are thus based primarily on supplier provided travel distance converted to CO_2-equivalents using factors from CO_2emissiefactoren.nl.

Category 13 – Downstream Leased Assets
SBM Offshore reports on emission from assets producing and/or storing hydrocarbons under lease contracts. GHG emissions come from the energy consumed (steam boilers, gas turbines and diesel engines) and from gas flared.

The environmental performance of SBM Offshore is reported by country i.e. Brazil, Angola, the United States, Guyana, Malaysia and Equatorial Guinea for the following 15 units:

- Brazil – *FPSO Espirito Santo*, *FPSO Cidade de Paraty*, *FPSO Cidade de Anchieta*, *FPSO Cidade de Ilhabela*, *FPSO Cidade de Marica*, *FPSO Cidade de Saquarema*, *FPSO Sepetiba*
- Angola – *FPSO Mondo*, *FPSO Saxi Batuque* and *N'Goma FPSO*
- Guyana – FPSO *Liza Destiny*, FPSO *Prosperity*
- Malaysia – *FPSO Kikeh*
- Equatorial Guinea – *FPSO Aseng*
- The United States – *Thunder Hawk* Floating Production Unit (FPU)[24]

The calculation of air emissions from offshore operations units uses the method described in the EEMS-Atmospheric Emissions Calculations (Issue 1.810a) recommended by Oil and Gas UK. SBM Offshore reports some of the indicators as a weighted average, calculated *pro rata* over the volume of hydrocarbon production per region. This is in line with the IOGP Environmental Performance Indicators.

All SBM Offshore business under an operating and maintenance service agreement (all downstream leased assets excluding Thunder Hawk) are required to issue a Daily Report (DR), which includes data from energy consumed and gas flared. Emissions calculations are performed using data storage and analysis software, where raw data from daily reports are saved. Emissions e-Dashboard is a comprehensive digital tool designed to monitor, analyze and report on emissions data within the organization. It serves as a central platform for tracking various emission sources, such as flared gas and flue gas consumption, ensuring compliance with local regulations and supporting environmental sustainability goals. By integrating data from multiple systems and employing advanced analytics, the Emissions e-Dashboard provides real-time (daily updates) insights into emissions trends, significant contributions and performance metrics. This enables operations managers and environmental engineers to make informed decisions, optimize processes, and implement effective emissions reduction initiatives. The dashboard's user-friendly interface facilitates easy access to detailed reports, historical data, and predictive analytics, promoting transparency and accountability across the organization. It also supports regulatory and contractual reporting requirements, ensuring accuracy and completeness in emissions data management.

GHG emissions intensity of downstream leased assets
The GHG Emission intensity figures in section 3.4.2 use hydrocarbon production as a denominator, being the standard metric in the industry (million tonnes of hydrocarbon produced). Hydrocarbon production is measured for each offshore asset.

Average Operational Excellence flaring of downstream leased assets
To better understand the causes of flaring that SBM Offshore may influence and be able to improve both environmental and operational performances, flaring events are reviewed and analyzed. Daily, the total flaring figure is broken down into flaring events that are categorized, based on the International Petroleum Industry Environmental Conservation Association (IPIECA) Guidelines. This process is part of Daily reporting and is called Flare CSR Reporting (Causes – Sources – Reasons). Depending on the causes identified, the responsibility is allocated to each event.

To further optimize operational excellence on the FPSOs for which it provides operations and maintenance services, SBM Offshore sets yearly targets. For 2024, SBM Offshore targeted an absolute volume of gas flared below 1.57 million standard cubic feet per day (MMSCFD) as an overall FPSO fleet average during the year.

Total energy consumption scope 1, 2 and 3
Demonstrating a clear understanding of energy consumption and resource efficiency also supports commensurate opportunities to mitigate CO_2 emissions. This indicator discloses the total quantity of energy consumed by SBM Offshore operations: scope 1 and 2

[24] Owned by SBM Offshore (lessor) and leased to the client, but without an operating and maintenance service agreement

related (Total Energy consumption from scope 1 and 2) and from downstream leased assets (Total energy consumption from downstream leased assets).

Total energy consumption from scope 1 and 2
Energy use associated with scope 1 and scope 2 GHG emissions. Consumption data was partially verified through meter readings, energy provider reports and landlord confirmations. For offices shared with other tenants, where only the total building energy consumption was available, SBM Offshore allocated energy usage to its office spaces based on the proportion of square meters occupied.

Total energy consumption from downstream leased assets
The energy used to produce oil and gas covers a range of activities, including:

- Driving pumps producing the hydrocarbons or reinjecting produced water.
- Heating produced oil for separation.
- Producing steam.
- Powering compressors to reinject produced gas.
- Driving turbines to generate electricity needed for operational activities.

The main source of energy consumption on offshore units is fuel gas and marine gas oil: the calculation of their volumes in Gigajoules being a function of calorific values and conversion factors from Oil and Gas UK.

Non-GHG emissions

Emissions to air are an important determinant of local and regional air quality and can affect human health, flora and fauna or cultural heritage sites. The indicators used enable SBM Offshore to monitor the quantities in tonnes of non GHG emissions to the atmosphere from operations, including CO (Carbon Monoxide), NOx (Nitrogen Oxides), SO_2 (Sulfur Dioxide) and VOCs (Volatile Organic Compounds).

Oil in produced water discharges

Produced water is a volume liquid discharge generated during the production of oil and gas. After extraction, produced water is separated and treated (de-oiled) before discharge to surface water. The quality of produced water is most widely expressed in terms of its oil content. Limits are imposed on the concentration of oil in the effluent discharge stream or discharge is limited where reinjection back into the reservoir is permitted.

Incidental environmental releases to air, water or land from the offshore operations units are highly controlled and reported using the data recorded in the SBM Offshore Incident Management tool.

Changes in reporting and continuous improvement

The following reporting changes apply:

- Emissions have been disaggregated by country, which were formerly a mix of regions and countries.
- Business wise, FPSO *Liza Unity* was sold to ExxonMobil Guyana, Ltd. on November 9, 2023. From that date on, its emissions are no longer part of scope 3 – Downstream leased assets. The 98,459.10 tonnes of CO_2e of associated emissions over 2024 needs to be reclassified and were not included in 2024 Downstream leased assets performance.
- *FPSO Sepetiba* joined the fleet on January 2, 2024, achieving first oil on December 31, 2023.
- SBM Offshore arranged for the full divestment of its effective equity interest in the lease and operating entities of the *FPSO Kikeh* to MISC. To ensure consistency with the previous reporting year and as the transaction will be effective January 2025, the emissions from *FPSO Kikeh* will be 100% accounted in downstream leased assets for the reporting year.
- FPSO *Prosperity* was sold to ExxonMobil Guyana, Ltd. on November 7, 2024 and the FPSO *Liza Destiny*, in December 19, 2024. From that date on, the emissions are no longer part of scope 3 – Downstream leased assets. Although, 100% of the GHG emissions associated with FPSO *Prosperity* and FPSO *Liza Destiny* in 2024 were accounted for in Downstream leased assets. Associated emissions over 2025 needs to be reclassified.

In 2024, emissions associated with the SBM Offshore 'Normand Installer' Installation Vessel have been assessed. They have, however, not been included at this stage to the overall reported emissions under scope 3 as the Installation Vessel is chartered to client projects in a joint venture (SBM Offshore 49.9% share), and the report excludes unconsolidated joint ventures. These emissions represent 21,653 tonnes CO_2e in 2024, which is not material in this category (0.3 % of scope 3).

As part of its commitment to continuous improvement, SBM Offshore regularly reviews and updates its emissions scope and calculation methodologies. While most emissions categories are covered, SBM Offshore is currently developing methodologies for categories 4 (upstream transportation and distribution), 7 (employee commuting), 11 (use of sold products), and 15 (investments). Other categories from the GHG Protocol, including category 2 (capital goods), category 3 (fuel- and energy-related activities), category 5 (waste generated in operations), category 8 (upstream leased assets), category 9 (downstream transportation and distribution), category 10 (processing of sold products), category 12 (end-of-life treatment of sold products), and category 14 (franchises), are not prioritized at this stage due to their lower

materiality in SBM Offshore's emissions reporting efforts. These ongoing efforts aim to enhance the accuracy and comprehensiveness of emissions reporting in line with SBM Offshore's sustainability objectives.

Emission factors for scope 1 and 2

Country	Location	Emission factor scope 1		Emission factor scope 2 Location based		Emission factor scope 2 Market based	
		2024	2023	2024	2023	2024	2023
The Netherlands	Amsterdam	1.779[2]		0.171[1]	0.370	0[1]	0
	Schiedam KDW 48	1.779[2]	1.785	0.171[1]	0.370	0[1]	0
	Schiedam KDW 66	1.779[2]	1.785	0.171[1]	0.370	0[1]	0
India	Bangalore	-	-	0.934[3]	0.713	0[1]	0.713
France	Carros Laboratory	2.045[4]	2.04	0.034[1]	0.041	0[1]	0.041
	Carros Workshop	2.045[4]	2.04	0.034[1]	0.041	0[1]	0.041
Guyana	Georgetown (Sheriff Street)	-	-	0.753[3]	0.616	0.753[3]	0.616
	Georgetown (Turkeyen)	-	-	0.753[3]	0.616	0.753[3]	0.616
United States	Houston	-	-	0.375[3]	0.373	0.375[3]	0.373
Malaysia	Kuala Lumpur	-	-	0.615[3]	0.436	0[1]	0.349
Portugal	LBH.E (Lionesa Business Hub)	-	-	0.417[1]	0.164	0[1]	0.164
	LBH.A (Lionesa Business Hub)	-	-	0.417[1]	0.164	0[1]	0.164
	LBH.B (Lionesa Business Hub)	-	-	0.417[1]	0.164	0[1]	0.164
Angola	Luanda Shorebase	2.662[4]	2.594	0.167[3]	0.426	0.167[3]	0.426
Equatorial Guinea	Malabo Shorebase	-	-	0.346[3]	0.361	0.346[3]	0.361
Switzerland	Marly	-	-	0.006[1]	0.012	0[1]	0
Monaco	Monaco	-	-	0.034[1]	0.041	0[1]	0
Brazil	Rio de Janeiro	-	-	0.074[3]	0.150	0[3]	0
	Santos Shorebase	-	-	0.074[3]	0.150	0[1]	0.150
China	Shanghai	-	-	0.661[3]	0.557	0[1]	0.557
Singapore	Singapore	-	-	0.502[3]	0.408	0[1]	0.408

1 Source: Association of Issuing Bodies 2023
2 Source: CO_2emissiefactoren.nl
3 Source: Carbon Footprint Ltd 2024
4 Source: DEFRA 2024

IOGP benchmark

Indicators	Benchmark	Unit	Reference
Total GHG emissions	128	tonnes of GHG/1,000 tonnes of hydrocarbon production	IOGP Environmental performance indicators – 2022 data – page 16
Total gas flared	8.6	tonnes of gas flared/1,000 tonnes of hydrocarbon production	IOGP Environmental performance indicators – 2022 data – page 26
Energy consumption	1.5	GJ/tonnes of hydrocarbon production	IOGP Environmental performance indicators – 2022 data – page 24
Oil-in-water	9.5	tonnes oil discharged to sea from produced water/ 10^6 tonnes of hydrocarbon production	IOGP Environmental performance indicators – 2022 data – page 28
Oil spills	0.4	oil spills greater than 1 bbl/10^6 tonnes of hydrocarbon production	IOGP Environmental performance indicators – 2022 data – page 38

3.9.3 SOCIAL REPORTING BOUNDARIES

OUR PEOPLE

SBM Offshore's HR data covers the global workforce and is broken down by countries, gender and employment type. The performance indicators report on the workforce status at year-end December 31, 2024. They include all staff assigned on unlimited or fixed-term contracts, employee new hires and departures, the total number of locally-employed staff from agencies and all crew working on board on the offshore operations units and shorebases.

In general, human resources initiatives and goals have continued, without a specific time frame. The performance and effectiveness of actions and projects are evaluated annually.

When referencing all SBM Offshore workforce collectively, this report uses the term 'Our People', which means directly hire (also called 'employee' in this report), contractors and individuals employed by a third party working in employment activities. Unless otherwise stated, the material impacts and opportunities outlined in this section apply to all individuals within SBM Offshore workforce. Beside that, certain policies, actions, metrics, and targets are specific to employees.

Headcount, turnover, equal remuneration and nationalization

Human Resources considers:

- a 'Direct hire' employee is a staff member holding a labor contract for either an unlimited or a defined period (or an offer letter for an unlimited period in the USA). Direct hires are recorded on the payroll, directly paid by one entity of SBM Offshore (including joint ventures). Direct hires perform mainly managerial, engineering and support activities.
- a 'Contractor' is an individual performing work for or on behalf of SBM Offshore. A contractor is not recognized as an employee under national law or practice (contractors do not form part of any of SBM Offshore's company payroll. Contractors issue invoices for services rendered). Contractors work on projects using their expertise to perform engineering or technical activities, especially on site.
- a 'Subcontractor' is an individual excluded from the headcount because subcontractors are not considered as staff in the HR headcount breakdown structure. Subcontractors are managed as a temporary service and are not covered by HR processes and policies. Yet, SBM Offshore has rigorous processes and procedures in place for subcontractors.

SBM Offshore's headcount figures are based on the number of people, as individuals, that are working for SBM Offshore at a specific given time. Headcount includes all types of staff independently from their contract or their work schedule. The Annual Report figures are based on the headcount at December 31, 2024.

In principle, reporting on headcount includes contractors, while turnover only includes direct hires. Turnover has been calculated as the number of employees who have left SBM Offshore (between January 1 and December 31, 2024) compared to the aggregate of the headcount on December 31, 2023 and December 31, 2024; divided by two, with the result multiplied by 100.

Concerning equal remuneration, SBM Offshore considers direct hires (excluding joint ventures and internships) in all locations. The gender pay gap has been calculated as such: average compa-ratio female/average compa-ratio male.

For fleet operations, engagement and development of the local workforce are the main indicators for successful implementation of the local content development plan. SBM Offshore monitors the percentage of the local workforce (excluding contractors) – the percentage of nationalization per region (the majority of SBM Offshore's offshore population are located in Brazil, Angola and Guyana) – and invests in training to increase or maintain the targeted level of nationals. For example, specific programs in the countries mentioned focus on education and training of nationals to facilitate them entering the workforce with the required level of qualifications and knowledge.

Performance Management

In order to ensure personal development and the optimal management of performance, SBM Offshore conducts annual performance reviews for its employees, using globally a common system to rate and evaluate them. For the reporting on Performance Appraisals, SBM Offshore included permanent staff, temporary (only from Brazil and the Netherlands) and JV staff (apart from *FPSO Kikeh*) of employees that joined SBM Offshore before October 1, 2024 and that were still with SBM Offshore on December 31, 2024.

Collective Bargaining

Within SBM Offshore, three entities conduct a yearly bargaining process: Angola, Brazil and the Schiedam entity in the Netherlands. In the other entities of SBM Offshore, direct hire employees are commonly represented by internal representatives that are elected on a yearly basis and according to the respective countries' labor practices. In the few places where employee representation is not organized, SBM Offshore considers the employee handbook as a valid labor agreement between the employee and the employer, signed during the hiring process.

HEALTH, SAFETY AND SECURITY

SBM Offshore's people work in demanding roles and conditions, with different risks to manage. The Health, Safety and Security (HSS) performance indicator boundaries take into account:

- Employees, which include all direct hires, part-time employees, locally-hired agency staff ('direct contractors') in the fabrication sites, offices and offshore workers, i.e. all people working for SBM Offshore.
- Contractors, which include any person employed by a contractor or contractor's subcontractor(s) who is directly involved in execution of prescribed work under a contract with SBM Offshore.

Until 2021, HSS incidents were reported and managed through SBM Offshore's incident management tool (SRS – Single Reporting System), which is a web-based reporting

system that is used to collect data on all incidents occurring in all locations where SBM Offshore operates. In 2021, SBM Offshore developed and began using the IFS Incident Management/Corrective Action Preventive Action (IM/CAPA) module for Brazil operations. In 2022, the IFS IM/CAPA module was rolled out to Guyana, Angola and Malaysia operations as well as projects. In 2023, it was further rolled out to the remaining company locations, with the exception of *FPSO Serpentina*.

Safety incidents are reported based on the incident classifications as defined by the IOGP Report 2022s-June 2023. Occupational injuries and illnesses are reported based on the Occupational Safety and Health Administration (OSHA) definition and described in IOGP Report Number 393 2023 – Health Performance Indicators. The main type of work-related injury categories are related to line of fire and slips, trips and falls. Investigations, based on the type, criticality and severity of the event, are performed by specifically identified personnel using methods such as TapRoot® and 5 Whys. SBM Offshore is ISM certified for offshore production fleet and operation offices, as well as being compliant with ISO 45001 as per certification and classification table (section 5.5).

Employees are provided with HSS training to familiarize themselves with SBM Offshore's health, safety, and security rules and regulations. The training topics are based on the hazards identified through the above identification process as well as safety studies and regulatory requirements. The promotion of a speak up culture – as described in section 2.5.2– contributes to the identification process. Inclusion and non-retaliation are part of the Speak Up Policy.

Process Safety

A Loss of Primary Containment (LOPC) is defined as an unplanned or uncontrolled release of any material from primary containment, including non-toxic and non-flammable materials (e.g. steam, hot condensate, nitrogen, compressed CO_2 or compressed air).

A Tier 1 PSE is defined as an LOPC from a process system that meets criteria defined in API RP 754.

LOPC events are reported in SBM Offshore's reporting system as highlighted in sections 3.5.2 and 3.9. This system includes a built-in calculation tool to assist the user in determining the release quantity of LOPC events. All LOPCs are analyzed to identify those considered to be PSEs as per API RP 754. Process Safety KPIs used by SBM Offshore include the number of Tier 1 PSEs.

SBM Offshore encourages employees and contractors to report the PSE minor LOPC (weeps and seeps) and precursors (e.g. integrity conditions, losing items), using them as a basis for leading initiatives aiming at minimizing the probability of major events occurring.

For the purposes of incident reporting, SBM Offshore reports against the three levels of incident Tier used by IOGP 456/ API 754:

- Tier 1: All events having actual severity of 4 or 5 as defined in the Common Thresholds Matrix.
- Tier 2: All events having an actual severity of 3 as defined in the Common Thresholds Matrix.
- Tier 3: All events having actual severity of 1 or 2 as defined in the Common Thresholds Matrix.

3.9.4 GOVERNANCE

ETHICS AND COMPLIANCE

SBM Offshore reports on significant fines paid by SBM Offshore and all affiliate companies. To define a significant fine the following threshold is considered (subject to final assessment by the Management Board on acase-by-case basis): operational fines of a regulatory and/or administrative nature which exceed US$500,000.